

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	§	
<b>BRAZOS LICENSING AND</b>	§	<b>CIVIL ACTION 6:20-cv-00923-ADA</b>
<b>DEVELOPMENT,</b>	§	<b>CIVIL ACTION 6:20-cv-00924-ADA</b>
<i>Plaintiff,</i>	§	<b>CIVIL ACTION 6:20-cv-00925-ADA</b>
	§	<b>CIVIL ACTION 6:20-cv-00926-ADA</b>
<b>v.</b>	§	<b>CIVIL ACTION 6:20-cv-00927-ADA</b>
	§	
<b>NEC CORPORATION,</b>	§	
<i>Defendant.</i>	§	
	§	

**PLAINTIFF'S AMENDED MOTION TO SUBSTITUTE COUNSEL**

**TO THE HONORABLE JUDGE OF SAID COURT:**

Pursuant to the Federal Rules of Civil Procedure, Isaac P. Rabicoff with the law firm of Rabicoff Law LLC asks the Court to allow him to withdraw and to permit substitution of counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development.

**I.**

Isaac P. Rabicoff with the law firm of Rabicoff Law LLC asks the Court to allow him to withdraw as counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development and to allow attorneys Jonathan K. Waldrop, Darcy L. Jones, Marcus A. Barber, John W. Downing, Heather S. Kim, Jack Shaw, with the law firm of Kasowitz Benson Torres LLP, and Mark D. Siegmund with the law firm of Walt Fair, PLLC, to substitute as counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development. Substituted counsel's state bar numbers, office address, e-mail addresses, telephone number, and fax number are as follows:

Jonathan K. Waldrop (CA Bar No. 297903)  
(Admitted in this District)  
jwaldrop@kasowitz.com  
Darcy L. Jones (CA Bar No. 309474)  
(Admitted in this District)  
djones@kasowitz.com  
Marcus A. Barber (CA Bar No. 307361)  
(Admitted in this District)  
mbarber@kasowitz.com  
John W. Downing (CA Bar No. 252850)  
(Admitted in this District)  
jdowning@kasowitz.com  
Heather S. Kim (CA Bar No. 277686)  
(Admitted in this District)  
hkim@kasowitz.com  
Jack Shaw (CA Bar No. 309382)  
(Admitted in this District)  
jshaw@kasowitz.com  
**KASOWITZ BENSON TORRES LLP**  
333 Twin Dolphin Drive, Suite 200  
Redwood Shores, California 94065  
Telephone: (650) 453-5170  
Facsimile: (650) 453-5171

Mark D. Siegmund (TX Bar No. 24117055)  
mark@waltfairpllc.com  
**LAW FIRM OF WALT FAIR, PLLC**  
1508 N. Valley Mills Drive  
Waco, TX 76710  
Telephone: (254) 772-6400  
Facsimile: (254) 772-6432

## II.

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development consents to and approves the withdrawal and substitution of counsel. The withdrawal and substitution will not delay these proceedings.

## III.

WHEREFORE, PREMISES CONSIDERED, Isaac P. Rabicoff with the law firm of Rabicoff Law LLC asks the Court to grant this request for him to withdraw as counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development and allow Jonathan K. Waldrop, Darcy L. Jones, Marcus A. Barber, John W. Downing, Heather S. Kim, Jack Shaw, with

the law firm of Kasowitz Benson Torres LLP, and Mark D. Siegmund with the law firm of Walt Fair, PLLC, to substitute as counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development and that all future correspondence, whether by the Court or other counsel, be directed to said attorneys with Kasowitz Benson Torres LLP and to Walt Fair, PLLC, and for general relief in law and in equity.

Dated: January 8, 2021

By: /s/ Isaac P. Rabicoff  
Isaac P. Rabicoff  
isaac@rabilaw.com  
Rabicoff Law LLC  
5680 King Centre Dr., Suite 654  
Alexandria, VA 22315  
Telephone: (773) 669-4590

**Attorney for WSOU INVESTMENTS,  
LLC d/b/a BRAZOS LICENSING AND  
DEVELOPMENT**

**REPRESENTATION ACCEPTED:**

By: /s/ Jonathan K. Waldrop

Jonathan K. Waldrop (CA Bar No. 297903)

(Admitted in this District)

jwaldrop@kasowitz.com

Darcy L. Jones (CA Bar No. 309474)

(Admitted in this District)

djones@kasowitz.com

Marcus A. Barber (CA Bar No. 307361)

(Admitted in this District)

mbarber@kasowitz.com

John W. Downing (CA Bar No. 252850)

(Admitted in this District)

jdowning@kasowitz.com

Heather S. Kim (CA Bar No. 277686)

(Admitted in this District)

hkim@kasowitz.com

Jack Shaw (CA Bar No. 309382)

(Admitted in this District)

jshaw@kasowitz.com

**KASOWITZ BENSON TORRES LLP**

333 Twin Dolphin Drive, Suite 200

Redwood Shores, California 94065

Telephone: (650) 453-5170

Facsimile: (650) 453-5171

By: /s/ Mark D. Siegmund

Mark D. Siegmund (TX Bar No. 24117055)

mark@waltfairpllc.com

**LAW FIRM OF WALT FAIR, PLLC**

1508 N. Valley Mills Drive

Waco, TX 76710

Telephone: (254) 772-6400

Facsimile: (254) 772-6432

**CERTIFICATE OF CONFERENCE**

The undersigned attorney certifies that he has conferred with counsel for Defendant on the 31st day of December, 2020, and they have indicated that they do not oppose this motion and the substitution of counsel in this matter.

/s/ Isaac P. Rabicoff

Isaac P. Rabicoff

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] — Document Filing System, to all counsel of record, on this 8th day of January, 2021.

/s/ Isaac P. Rabicoff

Isaac P. Rabicoff